

TOWN AND COUNTRY PLANNING ACT 1990
PLANNING AND COMPULSORY PURCHASE ACT 2004

RETAIL IMPACT ASSESSMENT

**FULL APPLICATION FOR ERECTION OF DISCOUNT FOOD STORE
AND TWO DRIVE-THROUGH RESTAURANTS TOGETHER WITH
ASSOCIATED CAR PARKING, SERVICE YARD, LANDSCAPING,
MEANS OF ACCESS AND ASSOCIATED INFRASTRUCTURE**

**WATERLOO PARK
ELETTRA AVENUE
WATERLOOVILLE**

**PREPARED ON BEHALF
OF**

HARGREAVES PROPERTIES LTD

March 2021

MWA

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1.0 INTRODUCTION

- 1.1 MWA has accepted an instruction from Hargreaves Properties Ltd in support of a planning application seeking permission for a discount food store on part of the former BAE systems site at Elettra Avenue, Waterloooville.
- 1.2 Planning permission was granted on 21st April 2016 (App. No. APP/15/00770) for the use of Block E for leisure (Class D2) and/or non-food retail purposes. This permission remains extant although prior approval for the demolition of Block E (APP/16/00603) was granted in July 2016. In granting planning permission in April 2016, we note that there was no objection to the scheme on policy grounds. Indeed, it was acknowledged that following the development of the Sainsbury's store, the site is logically placed in relation to the town centre and Waterloooville's other retail offer. It was also accepted that the uses accorded with Policy WA52 (BD54) of the Local Plan (Allocations) DPD¹. We do not believe that the policy position has materially changed following the publication of the NPPF in July 2018. The development plan policies remain unchanged.
- 1.3 Subsequently a planning application (No. 18/01072) was submitted seeking permission for a range of retail and leisure uses. This includes 4,000 sq.m. gross of non-food retail space. The Council has resolved to grant permission for this development subject to a legal agreement. However, that application relates to comparison goods retailing only.
- 1.4 The report is organised as follows:
- Section 2: This provides an overview of relevant local and national policies relating to main town centres uses.
- Section 3: A standard approach to assessing the impact of the convenience goods retail floorspace is provided focused on the development of a discount food supermarket.
- Section 4: This summarises our overall conclusions.
- 1.5 The proposal involves the provision of a discount supermarket extending to 1,786 sq.m. gross internal² as summarised in Table 1.1.

¹ Response of Planning Policy dated 15th September 2015.

² 1,908 sq.m. gross external.

Table 1.1: Proposed gross and net sales floorspace within food store (sq.m.)

Unit	Proposed occupier	Gross Internal floor area (sq.m.)	Net (sales) area (sq.m.)	Sales area (Comparison Goods)(sq.m.)	Sales area (convenience goods)(sq.m.)
1	Aldi	1,786	1,429 ³	350	1,079

- 1.6 Because there is no locally set threshold for requiring an impact assessment, the 2,500 sq.m. gross limit within paragraph 89 of the NPPF (February 2019) applies. This assessment has therefore been provided on a voluntary basis, in the absence of any local policy requirement within the adopted development plan, to provide an assessment of the likely trading effects associated with a food store of the size proposed.
- 1.7 A Sequential Assessment is provided in a separate report prepared by Harris Lamb which confirms that this policy requirement is met.

³ Based on ASSUMED 80:20 net to gross ratio.

2.0 RELEVANT PLANNING POLICY RELATING TO TOWN CENTRE USES

1. The development plan

- 2.1 For the purpose of section 38(6) of the Planning and Compulsory Purchase Act 2004 the development plan comprises the Havant Borough Core Strategy (March 2011) and the Havant Borough Local Plan (Allocations)(July 2014).
- 2.2 **Policy CS4** of the **Core Strategy** relates to Town, District and Local Centres. It states that the Council will seek to accommodate approximately 13,000 sq.m. (net) of new comparison goods retail floorspace within town and district centres to 2016.
- 2.3 The policy also states that planning permission will be granted for appropriate town centre development proposals that promote and enhance the hierarchy of identified centres. Havant and Waterlooville are identified as the two Town Centres within the borough. Paragraph 3.40 refers to the Town Centres, Retail and Leisure Study (2009) prepared by Nathaniel Lichfield and Partners. That study advised that committed retail developments could absorb the capacity for comparison goods retail space to 2011, but that by 2016 there was a projected need for 13,288 sq.m. net of additional space.
- 2.4 Paragraph 3.49 of the Core Strategy advises that approximately 4,000 sq.m. net of new comparison goods floorspace should be located in the west of the borough with approximately 9,000 sq.m. net in the east. It advises that sites will be allocated in the Allocations Plan to meet these needs. We note from the Council's Annual Monitoring Report (December 2017) that 7,617 sq.m. of comparison goods floorspace has been provided within Havant Town Centre on the Solent Retail Park⁴. However only 650 sq.m. of A3-A5 uses has been provided in Waterlooville (a McDonalds drive thru along Elettra Avenue as part of the redevelopment of the former BAE site). Table 5.11 of the AMR identifies a remaining requirement for 923 sq.m. net of comparison goods space in the Western part of the borough. We note however that this is not intended to provide a cap on new development since in the Eastern parts of the borough the requirement for 9,000 sq.m. net of comparison goods space has been exceeded by over 14,000 sq.m. Moreover, the requirement under Policy CS4 is to 2016 only.

⁴ M&S and Next.

- 2.5 Paragraph 3.50 notes that the provision of leisure, entertainment and cultural facilities within the borough is limited reflecting the size of the catchment and the range of facilities in Portsmouth and Chichester. The 2009 study suggested there was scope for a small cinema, a bingo club and health and fitness facilities.
- 2.6 Paragraph 3.42 refers to Waterlooville Town Centre which was developed to support expanding post-war residential areas west of the A3(M). It contains two small pedestrian precincts and Dukes Walk Shopping Centre. It serves the western side of the borough. The town centre now also includes the Waterlooville Retail Park and the Sainsbury's superstore at Hambledon Road.
- 2.7 **Policy AL3** of the **Local Plan (Allocations)**, refers to Town, District and Local Centres. It supports town centre uses which contribute to their vitality and viability and supports enhancement of their primary shopping areas.
- 2.8 Policy WA2 Waterlooville Mixed Use Allocations identifies 5 sites which are allocated for mixed-uses. Site W109 Asda/Clock Tower extends to 3.22ha and supports housing and main town centre uses. Site BD54 which includes the application site supports economic development⁵, a hotel and leisure uses. The site is defined as out of centre for retail uses and edge of centre for main town centre uses, the policy acknowledges that there is scope to provide a bowling alley or cinema that could not be accommodated in the town centre. The site is judged to be within walking distance of the town centre.

2. National guidance

- 2.9 The **National Planning Policy Framework** (NPPF) was published in February 2019 and sets out the Government's overarching planning policies.
- 2.10 There is no requirement to demonstrate that there is a need for a retail proposal set out in the NPPF.
- 2.11 Paragraph 86 states that LPAs should apply a sequential test to planning applications for main town centre uses that are not in an existing centre nor in accordance with an up-to-date plan. Suitable sites include those which are likely to become available within a reasonable period although the latter is not defined.

⁵ The NPPF includes retail uses as economic development.

- 2.12 Paragraph 89 of the NPPF sets out the circumstances under which an Impact Assessment should be undertaken to accompany proposals for retail, leisure, and office development outside of town centres, which are not in accordance with an up to- date Local Plan. Planning authorities should require an Impact Assessment if the development is over a proportionate locally set floorspace threshold. Paragraph 89 goes on to state that where there is no locally set threshold, the default threshold is 2,500 sq. m. There is no locally adopted threshold. On this basis there is no policy requirement for an impact assessment to be provided.
- 2.13 Where an Impact Assessment is required⁶, paragraph 89 states that this should include an assessment of:
- The impact of the proposal on existing, committed and planned public and private investment in the centre or centres in the catchment area of the proposal; and
 - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.

⁶ No IA is required by policy in respect of the proposal but one has been provided on a voluntary basis.

3.0 RETAIL IMPACT ASSESSMENT

(i) Introduction

- 3.1 In order to assist the Council we have provided an Impact Assessment using a new telephone household survey commissioned from NEMS⁷ together with up to date population and expenditure data using Experian's Location Analyst computer mapping software. The survey zones used to define the primary catchment area of Waterloo Town Centre are derived from the original data contained within the Town Centres, Retail and Leisure Study (TCRLS) prepared by NLP in 2009. This report remains part of the evidence-based underpinning both the Core Strategy (2011) and Local Plan Allocations (2014). The Council also uses the study as part of its annual monitoring of the provision of retail space across the borough. However, since the study is of some age, we determined in the light of the proposed convenience goods floorspace, that more up to date information was justified.
- 3.2 Paragraph 017 ID: 2b-017-20190722 of the National Planning Practice Guidance 'Town Centres and Retail' (2014) provides advice on how the impact test should be used in decision taking. It should be proportionate to the scale of development proposed and ideally applicants should agree the scope and key impacts and level of detail required, prior to an application being submitted.
- 3.3 Paragraph 018 ID: 2b-018-20190722 sets out factors which should be considered in undertaking an assessment:
- establish the state of existing centres and the nature of current shopping patterns (base year)
 - determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur
 - examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
 - assess the proposal's turnover and trade draw (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)
 - consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)

⁷ Undertaken in May 2020 with questions adapted to reflect Covid-19 restrictions.

- set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences for the vitality and viability of existing town centres

3.4 The NPPG notes that as a guiding principle, impact should be assessed on a like-for-like basis in respect of that particular sector. Retail uses tend to compete with their most comparable competitive facilities. It also notes that where wider town centre developments or investments are in progress, it will be appropriate to assess the impact of relevant applications on that investment. Key considerations are identified as including:

- The policy status of the investment (i.e. whether it is outlined in the Development Plan).
- The progress made towards securing the investment (for example if contracts are established).
- The extent to which an application is likely to undermine planned development or investments based on the effect on current/forecast turnovers, operator demand and investor confidence.

3.5 When assessing the potential trading effects, it is important to note that the NPPF (paragraph 90) advises that permission should be denied only where there is a 'significant adverse impact on one of more of the considerations set out in paragraph 89 i.e.

- a) The impact of a proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of a proposal; and
- b) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment.

3.6 In assessing whether a scheme is likely to have a significant adverse effect it is necessary for such a decision, to be based on evidence. In relation to an appeal in Derby (APP/C1055/A/11/2161815), the Inspector at paragraph 116 of the DL opined that:

"To justify an objection to the proposal it is not sufficient to simply suggest that there will be an impact. There is no persuasive evidence of such a significant impact that would be likely to undermine the vitality and vitality of the city centre trade/turnover and trade in the wider area, arising from the appeal proposal."

3.7 In relation to impact on **planned investment**, the Secretary of State for Communities and Local Government ('SoS') allowed an appeal for an out-of-centre retail proposal that he called

in for his determination⁸. Paragraph 8.60 of the Inspector's report stated:

"NPPF [26] requires an assessment of the impact (if any) of the proposal on 'existing, committed and planned public and private sector investment' in a centre. That requirement is quite straightforward, only investment that has been made, and been committed or is planned warrants considerations. There appears to be general agreement that 'existing' investment is to be taken as a reference to investment that has already been made and that 'committed' investment is that which is contractually committed (private) or subject to resolution (public)'.

- 3.7 The NPPG advises that a judgement must be made in assessing whether impacts are likely to be significant. As we set out below, while impacts on the town centre's existing food stores will arise, these are all predicted to be modest and well below the level of impact judged by Inspector's when granting planning permission for development outside existing centres. For example, a supermarket planned within a wider mixed-use scheme in Warwickshire (APP/J3720/A/13/2194850) in February 2015 involved an impact on the centre's turnover in excess of 40%. But this was held not to conflict with the NPPF.

(ii) Impact methodology

Step 1: Establish the scope of the assessment

- 3.8 For the purposes of our assessment we have adopted the following assumptions:

Primary Catchment Area (PCA)⁹: We have defined 4 zones based on the following postcodes. These are combined into a single PCA as set out in **Appendix [2]**.

Zone	Postcode sectors	Population 2019
A	PO 7 5/8	20,838
B	PO 7 6/7 PO 8 8	31,797
C	PO 8 0/9	25,339
D	PO 7 4 PO 17 6	3,495

⁸ Appeal Reference APP/G2815/V/12/2190175

⁹ The zones equate to approximately a 10-minute drive time towards Havant and Drayton to the south-east and south and a 15-minute drive time towards the more rural parts such as Wickham to the west, Hambledon to the north-west and Clanfield in the north. All of these outlying, rural areas look towards Waterlooville as their main food and convenience goods shopping destination which is the closest town centre.

Population and expenditure:	Sourced from Experian's Location Analyst Area Comparison Report; Data Version UK 2019
Base year:	2019
Design year:	2023 which equates to four-five years post base date and assumes opening in 2022 with settled trading by 2023
Price base:	At constant 2018 prices
Gross floorspace:	1,786 sq.m.
Net floorspace:	1,429 sq.m ¹⁰ .
	Convenience goods 1,079 sq.m.
	Comparison goods 350 sq.m.
Estimated design year turnover: (2023)	Convenience goods £13.25m ¹¹
	Comparison goods £3.56m ¹²

Step 2: Examine 'no development' Scenario: Comparison and Convenience goods

- 3.9 **Appendix [1]** contains the tables associated with the impact assessment. The calculations are based on an initial assessment of the results of the telephone household survey conducted by NEMS in May 2020 and covering 371 households within the 4 survey zones.

Population and expenditure

- 3.10 **Table 1a** sets out the population within postcode sectors and the 4 zones comprising the PCA, based on Experian's Location Analyst. These reflect the results of the Town Centres, Retail and Leisure Study (2009), which identified from which postcodes the town centre drew the majority of its trade (see **Table 1b**). However, the 4 zones we have used represent a more tightly defined catchment when compared with the 2009 study which also included an allowance of 15% inflow from outside and we have

¹⁰ 80% of the gross floor area.

¹¹ Based on Aldi's company average sales density of £12,228 sq.m. for convenience goods at 2018 prices.

¹² Based on Aldi's company average sales density for comparison goods of £10,187 sq.m. at 2018 prices.

- 3.11 **Table 2** contains the convenience goods expenditure per capita by zone in 2019 and 2023 at 2018 prices. These have been discounted to exclude special forms of trading which does not occur within traditional stores based on Experian's Retail Planner Briefing Note 17 (February 2020). The growth rates are also applied using predicted rates within the Retail Planner Briefing Note 17. **Table 3** provides the equivalent information for comparison goods.
- 3.12 **Tables 4** and **5** summarise the total convenience and comparison goods expenditure within the four zones in 2019 and 2023.
- 3.13 In order to provide a more robust assessment of convenience goods shopping patterns, **Table 6** splits the convenience goods expenditure into 'main' food and 'top-up' shopping, applying a 70%-25% split in 2019 and 2023.
- 3.14 **Tables 7** and **8** also sub-divide the comparison goods expenditure into 7 sub-categories which can be used to define the shopping patterns more accurately within the PCA in 2019 and 2023. This will provide a more up-to date estimate of the town centre's comparison goods turnover. **Table 9** provides the total comparison goods expenditure by zone.

Comparison and convenience goods shopping patterns

- 3.15 The NEMS survey represents the most up to date information on shopping patterns in this part of the borough. Questions were phrased in order to reflect any changes which were related to the Covid-19 restrictions on movement and how these would affect typical, shopping trips.
- 3.16 The survey asked respondents a series of questions as set out in Table 4.1.

Table 4.1: Telephone household survey questions

Q1	Where did you last undertake your main food and grocery shopping?
Q2	How often do you normally do your main food shopping at (store mentioned in Q1)
Q3	How do you normally travel when undertaking your main food shop?
Q4	When your household undertakes its main food shopping (in store mentioned at Q1) does it also visit other shops or service outlets on the same shopping trip?
Q5	Where did you undertake your main food and grocery shopping the time before your last visit to (store mentioned in Q1) was it the same place, or different and if so please specify?
Q6	How often do you normally do your main food and grocery shopping at store (mentioned in Q5).

Q7	Where did you last undertake your household's shopping for small scale/daily 'top up' shopping?
Q8	Where do you do most of your households shopping for clothes, footwear, and other fashion goods?
Q9	Where do you do most of your household's shopping for furniture, floor coverings, soft furnishings, or household textiles?
Q10	Where do you do most of your household's shopping for DIY, hardware, decorating goods, garden products, plants, or pet related products?
Q11	Where do you do most of your households shopping for small and large electrical goods including photographic equipment?
Q12	Where do you do most of your household's shopping for other non-food items including books, jewellery, china, glass, and household goods?
Q13	Where do you do most of your household's shopping for health, beauty, or chemist items (excluding prescriptions)?
Q14	Where do you do most of your household's shopping for recreational goods including bicycles, toys, sports, and camping equipment?
Q15	How does your household normally travel when undertaking shopping for non-good goods?
Q16	Overall, which is the main town/district centre you most regularly visit for your household's non-food shopping needs?

- 3.17 The survey combined with the population and expenditure estimates provides the basis for assessing baseline and design year shopping patterns under a 'no development' scenario.
- 3.18 **Tables 10a-10d** summarise the total **comparison goods** expenditure attracted to Waterloooville Town Centre by zone in 2019 and 2023, based on the NEMS survey. **Table 11** aggregates the totals with an allowance for in-flow from outside the PCA. **Table 12** summarises the comparison goods retained within the PCA catchment area. This confirms that from the four zones, only 40.7% of all comparison goods expenditure was retained by the town centre.
- 3.19 In relation to **convenience goods**, **Tables 13a-13d**, set out the main food shopping patterns by zone, based on 1st and 2nd preferences. **Tables 14a-14d** provide the equivalent analysis for top-up food shopping. The survey indicates that a number of stores outside the catchment attract main food shopping trips particularly the Asda store at Larchwood Avenue, Bedhampton and Morrisons at Horndean. In relation to Waterloooville Town Centre the Asda store is trading particularly well with Sainsbury's and Waitrose trading at or slightly above company average levels. The Iceland store from the survey appears to be trading somewhat below average a reflection of the smaller size of the store and the propensity for the survey to be dominated by the larger food stores.

Step 3: Turnover and trade draw

Turnover

- 3.20 The convenience goods turnover of the Aldi store is £13.25m. The predicted comparison goods turnover is substantially less than the £15.05m¹³ modelled in respect of App. No. 18/01052 and the impact of this quantum of floorspace has therefore been accepted by the Council.
- 3.21 The trade draw comprises a number of components (see Tables 16 and 17 at **Appendix [1]**):
1. The majority will be drawn from Zones 1 and 2 (65%) which is the core of the convenience goods catchment associated with the town centre. However, from Tables 13a-13b and 14a-14b it is also clear that a significant proportion of main food and top-up shopping expenditure is 'lost' from these zones, outside the town as a whole. There is therefore scope to retain a greater proportion of expenditure locally.
 2. Diversion from the larger food stores and supermarkets in the town centre which accommodate the majority of convenience goods expenditure.
 3. Diversion from the Lidl supermarket adjacent to the proposal which operates on a 'like for like' basis with Aldi.

Step 5: Assess impact

Convenience goods

- 3.22 When assessing the likely impact on the town centre it is necessary to have an understanding of Aldi's business model. The company's core aim is to provide value retailing of high quality food at heavily discounted prices. As a concomitant, the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets.

¹³ This is based at 2007 prices consistent with the retail study. Converting to 2018 prices consistent with this report, provides a turnover in 2021 of £21.8m and therefore substantially less than the Council has already accepted.

3.23 The approach is dissimilar to the larger supermarkets which stock in the region of 20,000 - 40,000 product lines. Aldi do not sell cigarettes and tobacco products, stationary products and pharmaceutical products. The Aldi trading philosophy does not include a specialist butcher, fishmonger, in-store bakery, delicatessen or hot food counter which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes / restaurants or franchises such as photo processing, dry cleaning, or opticians. Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for Aldi when compared to larger supermarkets that typically have 30%-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges. Aldi therefore complement, rather than compete with, existing local traders, independent retailers, and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

(a) Impact on existing, committed, or planned investment

3.24 As far as we are aware there is no planned or committed development within Waterlooville Town Centre. The former Curzon Rooms (Site W56) has not come forward for development and in any event involves a primarily residential led development with the potential for small scale units at ground floor.

(b) Impact on vitality and viability

3.25 The Council published in October 2017 'Havant and Waterlooville Town Centres Study'. This document has been prepared to support the Havant Borough Local Plan 2036. It is acknowledged that it pre-dates the effects of Covi-19 on high streets together with the government's changes to the Town and Country Planning (Use Classes) Order 2020. The effects of these considerations will take a number of years to emerge, although the impact of Covid-19 has in particular led to significant improved trading performances in the larger food stores.

3.26 The key findings of the 2017 study are as follows:

- Class A1 space within the centre has significantly increased and the number of units have increased since 2008 from 101 to 117 in 2015.

- The number of shops within the primary frontages has increased due in part to including units within the Wellington retail Park.
- The number of charity shops has doubled from 7 in 2008 to 13 in 2015.
- Vacant units have increased from 10.6% in 2014 (20 units) to almost 14% in 2017 (27 units). This is marginally above the GOAD average at around 12%.
- Rents have started to improve to between £12 and £15 per foot in 2016/17.
- The levels of pedestrian flows have varied but overall, for all streets examined there have been a significant increase since 2015.

3.27 The telephone household survey confirms that the town centre's comparison goods turnover is predicted to be in excess of £162m by 2023. Although we acknowledge that the impact of Covid-19 on town centre's a recent appeal decision relating to a retail development in Nottinghamshire¹⁴ (see **Appendix [3]**), confirmed the Inspector's view (at paragraph 24 of the DL), that:

"What the ultimate effect of the Covid 19 pandemic will be on retailing in general and this town centre is unknown. Whilst it may prove the final straw for some commercial activities that were already struggling before March 2020 it may also, once life without restrictions returns, provide opportunity for others to emerge. In this context, to weigh such a significant unknown and hopefully short-term factor in the balance when assessing economic investment of the scale and nature proposed by the appellants is, in my view, either impossible or short sighted."

3.28 **Table 17** summarises the convenience goods diversion in 2023. The largest impact in respect of the town centre is predicted to fall on the Asda and Sainsbury's stores, with impacts of 8.4% and 6.5% respectively. The Asda store in particular is trading well and also benefits from a significant comparison goods turnover. Sainsbury's will continue to trade at around company levels, and neither can be expected to close, both will have benefited from the significant uplift in the sale of convenience goods from such stores in 2020 and which is likely to continue into 2021. The impact on Waitrose is predicted to be around 3.3% and again this would not give rise to any risk of closure because the Waitrose offer is markedly different to that offered by Aldi. Iceland would experience an impact of almost 5.3%. The store would trade at around company averages post-impact which is typical for the store of this size.

¹⁴ APP/N1025/W/20/3251315; December 2020.

- 3.29 However, as previously stated the impact of Covid-19 has had a positive impact on trading levels within existing food stores which have been able to remain open during the pandemic and we would have expected at least in the short terms for the trading levels of existing stores to have increased.
- 3.30 The impact on the town's convenience goods trade, overall would be around 6.3%. This is not considered to be significantly adverse. Based on the town centre's total turnover in 2023¹⁵, the impact would be 2.4%.
- 3.31 In assessing the predicted impact it is important to note that Aldi as the intended operator, sells a range of core items which primarily involve the company's own labels, at discounted levels. Typically, the company's stores sell around 2,000 products and do not for example sell tobacco products, stationery, or pharmaceutical items. Nor does it trade specialist in-house counters selling bread and meat which limits the impact on smaller independent traders.

Comparison goods

- 3.32 The comparison goods turnover of the Aldi store is predicted to be £3.56m in 2023. The construction of the Aldi store together with the two drive-through restaurants would however displace approximately 50% of the comparison goods retail space subject to approval under App. No. 18/01052¹⁶. That scheme is proposed to achieve a design year comparison goods turnover of £15.01m in 2021 at 2007 prices. In 2018 prices the turnover would be approximately £15.5m.
- 3.33 Assuming that 50% of the floorspace under Ap. No. 18/01052 is not constructed this would reduce the turnover by £7.75m. Therefore the current application would lead to a net reduction of £4.19m in potential comparison goods sales and thus give rise to a reduced level of impact on the town centre's comparison goods turnover in 2023.

¹⁵ £263.74

¹⁶ On a pro-rata basis the balance of the comparison goods retail space would be 1,920 sq.m. gross (1,344 sq.m. net based on 70%:30% net to gross ratio).

4.0 OVERALL CONCLUSIONS

- 4.1 The household survey has confirmed that the convenience goods turnover of the town centre is relatively robust and has experienced a significant increase since the Council's 2009 retail study. In large part this is due to the development of the Sainsbury's superstore. Nonetheless, all stores other than Iceland at Wellington Way, are trading at or above company averages.
- 4.2 Therefore while the convenience goods impact on the town centre's convenience goods turnover would be in the order of 6-7% in 2023, we would not expect any significant change to the retail offer provided within the main food stores, which are all trading at or above company average levels.
- 4.3 Additionally, the impact on the town's overall turnover in 2023 would be significantly less than 3% and this would not give rise to any material impact on its health and vitality.

Appendix [1] Retail impact tables (January 2021)

Table 1a: Population within postcode sectors/zones

Postcode sector	Zone	PCA	Population 2019	Population 2023	Sample
PO 7 5/8	7/8	A	20,838	21,398	75
PO 7 6, 7 and PO 8 8	9/10/11	B	31,797	32,528	150
PO 8 0 & 9	12/13	C	25,339	26,003	150
PO 7 4/17 6	14/18	D	3,495	3,561	25

Source: Location Analyst Area Comparison Report; Data Version UK 2019.

Zones reflect those set out in the Town Centres, Retail and Leisure Study (March 2009) prepared by Nathaniel Lichfield and Partners Ltd. We have aggregated these into four zones: A, B, C and D which reflect the Primary Catchment Area (PCA) of Waterlooville town centre. The zones equate to approximately a 10-minute drive time towards Havant and Drayton to the south-east and south and a 15-minute drive time towards the more rural parts such as Wickham to the west, Hambledon to the north-west and Clanfield in the north. All of these outlying, rural areas look towards Waterlooville as their main food and convenience goods shopping destination.

Appendices B and C to the report summarised the market shares for convenience and comparison goods shopping based on a telephone household and street surveys undertaken by NEMS in 2008. The respective shares are set out in Table 1b below.

Table 1b: Convenience and comparison goods market shares for Waterlooville Town Centre (2008)

Postcode sector	Zone	PCA	Convenience Goods Market Share % ¹	Comparison Goods Market Share % ²
PO 7 5/8	7/8	A	24.5	29.5
PO 7 6, 7 and PO 8 8	9/10/11	B	41.0	39.0
PO 8 0 & 9	12/13	C	17.5	28.5
PO 7 4/17 6	14/18	D	22.0	27.5

Notes:

The market share is the average between the respective zones since the 2008 study identified a total of 21 zones across the study area to cover Havant Borough East and Havant Borough West. Waterlooville lies within Havant Borough West. The retail parks were included within the town centre turnover.

For convenience goods, the study estimated that £3.04m was drawn from the remaining zones (6.7%) with a further allowance of a 10% inflow. This equated to 16.7% of the town's convenience goods turnover in 2008.

For comparison goods, the town centre also attracted expenditure from outside the PCA. In 2008 from the remaining study area zones, this equated to £13.84m. In addition, the study estimated a further inflow of £10.09. In total this represented 23.7% of its total comparison goods turnover in 2008.

¹ Table 4B of Appendix B to the 2008 study.

² Table 3C of Appendix C to the 2008 study.

Table 2: Convenience goods expenditure per capita by zone 2019-2023 £'s (2018 prices)

Postcode sector	Zone	PCA	Expenditure per capita 2019	Expenditure per capita 2023
PO 7 5/8	7/8	A	2,206	2,204
PO 7 6, 7 and PO 8 8	9/10/11	B	2,182	2,180
PO 8 0 & 9	12/13	C	2,188	2,186
PO 7 4/17 6	14/18	D	2,565	2,562

Source:

1. Expenditure per capita by zone in 2019 derived from Area Comparison Report generated using Experian's Location Analysts software which provides a baseline estimate including SFT in 2018.
2. All estimates exclude special forms of trading generated by non-store sales in accordance with Experian's Retail Planner Briefing Note 17 (February 2020)(RPBN).
3. The RPBN provides expenditure growth rates considering SFT made within traditional stores. These growth rates are set out below:

2019	-0.8
2020	-0.3
2021	0.2
2022	-0.2
2023	-0.2

It should be noted however that the impact of Covid-19 is predicted to have increased convenience goods spending within proceri stores.

Table 3: Comparison goods expenditure per capita by zone 2019-2023 £'s (2018 prices)

Postcode sector	Zone	PCA	Expenditure per capita 2019	Expenditure per capita 2023
PO 7 5/8	7/8	A	3,398	3,710
PO 7 6, 7 and PO 8 8	9/10/11	B	3,385	3,696
PO 8 0 & 9	12/13	C	3,543	3,868
PO 7 4/17 6	14/18	D	4,318	4,714

Source:

1. Expenditure per capita by zone in 2019 derived from Area Comparison Reports generated using Experian's Location Analyst software, used under licence by MWA. The 2018 baseline estimate which includes SFT has been adjusted to provide a 2019 base date from which projections to 2023 can be made.
2. All estimates exclude special forms of trading generated by non-store sales in accordance with Experian's Retail Planner Briefing Note 17 (February 2020)(RPBN).
3. The RPBN provides expenditure growth rates considering SFT made within traditional stores. These growth rates are set out below:

2019	2.9
2020	2.0
2021	2.3
2022	2.3
2023	2.3

Table 4: Total Convenience goods expenditure by zone 2019-2023 £m's (2018 prices)

Postcode sector	Zone	PCA	Total convenience goods expenditure 2019 £ms	Total convenience goods expenditure 2023 £ms
PO 7 5/8	7/8	A	£45.97	£47.16
PO 7 6, 7 and PO 8 8	9/10/11	B	£69.38	£70.91
PO 8 0 & 9	12/13	C	£55.44	£56.84
PO 7 4/17 6	14/18	D	£8.96	£9.12
Total	-	-	£179.75	£184.03

Source:

From Tables 1a and 2.

Table 5: Total Comparison goods expenditure by zone 2019-2023 £m's (2018 prices)

Postcode sector	Zone	PCA	Total comparison goods expenditure 2019 £ms	Total comparison goods expenditure 2023 £ms
PO 7 5/8	7/8	A	£70.81	£79.39
PO 7 6, 7 and PO 8 8	9/10/11	B	£107.63	£120.22
PO 8 0 & 9	12/13	C	£89.78	£100.58
PO 7 4/17 6	14/18	D	£15.09	£16.79
Total	-	-	£283.31	£316.98

Source:

From Tables 1a and 3.

Table 6: Main food and top up shopping expenditure by zone 2019-2023 £'ms (2018 prices)

Postcode sector	Zone	PCA	Total main food convenience goods expenditure 2019 £ms	Total main food convenience goods expenditure 2023 £ms	Total top-up convenience goods expenditure 2019 £ms	Total top-up convenience goods expenditure 2023 £ms
PO 7 5/8	7/8	A	£34.44	£35.37	£11.53	£11.79
PO 7 6, 7 and PO 8 8	9/10/11	B	£52.04	£53.18	£17.34	£17.73
PO 8 0 & 9	12/13	C	£41.58	£42.63	£13.86	£14.21
PO 7 4/17 6	14/18	D	£6.72	£6.84	£2.24	£2.28
Total	-	-	£134.78	£138.02	£44.97	£46.01

Source:

From Table 5 with the following split applied to total convenience goods expenditure:

Main food shop: 75%

Top-up shop: 25%

Table 7: Expenditure per capita - comparison goods sub-category by zone in 2019 (%)

Sub-category	Zone A	Zone B	Zone C	Zone D
	%	%	%	%
Clothing/shoes	23.7	23.8	23.5	21.6
Furniture/floor coverings/soft furnishings or household textiles	13.3	13.4	12.9	13.8
Electrical/audio-visual	12.8	12.4	12.1	13.8
Books, jewellery, china, glass and household goods	13.4	12.3	12.8	13.1
Health, personal care, beauty or chemist goods	17.5	15.6	15.9	16.1
Recreational goods including bicycles, toys, sports and camping equipment	11.9	12.1	12.4	12.1
Other	7.4	10.4	10.4	9.5
Total	100	100	100	100

Source: Experian Location Analyst consumer retail expenditure per person by goods type sourced from Area Comparison Reports

Table 8: Total comparison goods expenditure by zone in 2019 (£ms)

Sub-category	Zone A	Zone B	Zone C	Zone D
	£ms	£ms	£ms	£ms
Clothing/shoes	16.79	25.62	21.10	3.26
Furniture/floor coverings/soft furnishings or household textiles	9.41	14.42	11.58	2.08
Electrical/audio-visual	9.06	13.34	10.86	2.08
Books, jewellery, china, glass and household goods	9.49	13.24	11.49	1.98
Health, personal care, beauty or chemist goods	12.39	16.79	14.28	2.43
Recreational goods including bicycles, toys, sports and camping equipment	8.43	13.02	11.13	1.83
Other	5.24	11.20	9.34	1.43
Total	70.81	107.63	89.78	15.09

Table 9: Total comparison goods expenditure by zone in 2023 (£ms)

Sub-category	Zone A	Zone B	Zone C	Zone D
	£ms	£ms	£ms	£ms
Clothing/shoes	18.82	28.61	23.64	3.63
Furniture/floor coverings/soft furnishings or household textiles	10.56	16.11	12.97	2.32
Electrical/audio-visual	10.16	14.91	12.17	2.32
Books, jewellery, china, glass and household goods	10.64	14.79	12.87	2.20
Health, personal care, beauty or chemist goods	13.89	18.75	15.99	2.70
Recreational goods including bicycles, toys, sports and camping equipment	9.45	14.55	12.47	2.03
Other	5.87	12.50	10.47	1.59
Total	79.39	120.22	100.58	16.79

Table 10a: Zone A - Expenditure attracted to WaterlooVille Town Centre 2019-2023 (£ms)

Zone A:

Sub-category	Zone A 2019	Zone A 2023	% to WaterlooVille Town Centre	Total attracted from Zone A 2019	Total attracted from Zone A 2023
	£ms	£ms	%	£ms	£ms
Clothing/shoes	16.79	18.82	30.0	5.04	5.65
Furniture/floor coverings/soft furnishings or household textiles	9.41	10.56	44.7	4.21	4.72
Electrical/audio-visual	9.06	10.16	29.3	2.65	2.97
Books, jewellery, china, glass and household goods	9.49	10.64	45.5	4.32	4.84
Health, personal care, beauty or chemist goods	12.39	13.89	68.4	8.47	9.50
Recreational goods including bicycles, toys, sports and camping equipment	8.43	9.45	25.0	2.10	2.36
Other	5.24	5.87	31.9	1.67	1.87
Total	70.81	79.39	-	28.46	31.91

Note: The town centre turnover includes the Wellington Retail Park, Asda and Sainsbury's superstores.

Table 10b: Zone B - Expenditure attracted to Waterlooville Town Centre 2019-2023 (£ms)

Zone B

Sub-category	Zone B 2019	Zone B 2023	% to Waterlooville Town Centre	Total attracted from Zone B 2019	Total attracted from Zone B 2023
	£ms	£ms	%	£ms	£ms
Clothing/shoes	25.62	28.61	33.8	8.66	9.67
Furniture/floor coverings/soft furnishings or household textiles	14.42	16.11	60.4	8.71	9.73
Electrical/audio-visual	13.34	14.91	44.7	5.96	6.66
Books, jewellery, china, glass and household goods	13.24	14.79	56.1	7.43	8.30
Health, personal care, beauty or chemist goods	16.79	18.75	65.6	11.01	12.30
Recreational goods including bicycles, toys, sports and camping equipment	13.02	14.55	46.6	6.07	6.78
Other	11.20	12.50	64.2	7.19	8.03
Total	107.63	120.22	-	55.03	61.47

Table 10c: Zone C - Expenditure attracted to Waterlooville Town Centre 2019-2023 (£ms)

Zone C

Sub-category	Zone C 2019	Zone C 2023	% to Waterlooville Town Centre	Total attracted from Zone C 2019	Total attracted from Zone C 2023
	£ms	£ms	%	£ms	£ms
Clothing/shoes	12.10	13.64	33.4	4.04	4.56
Furniture/floor coverings/soft furnishings or household textiles	11.58	12.97	48.1	5.57	6.24
Electrical/audio-visual	10.86	12.17	30.8	3.34	3.75
Books, jewellery, china, glass and household goods	11.49	12.87	37.2	4.27	4.79
Health, personal care, beauty or chemist goods	14.28	15.99	46.0	6.57	7.36
Recreational goods including bicycles, toys, sports and camping equipment	11.13	12.47	43.5	4.84	6.29
Other	9.34	10.47	13.8	1.29	1.44
Total	89.78	100.58	-	29.92	34.43

Table 10d: Zone D - Expenditure attracted to Waterlooville Town Centre 2019-2023 (£ms)

Zone D

Sub-category	Zone D 2019	Zone D 2023	% to Waterlooville Town Centre	Total attracted from Zone D 2019	Total attracted from Zone D 2023
	£ms	£ms	%	£ms	£ms
Clothing/shoes	3.26	3.63	6.7	0.22	0.24
Furniture/floor coverings/soft furnishings or household textiles	2.08	2.32	20.1	0.42	0.47
Electrical/audio-visual	2.08	2.32	7.7	0.16	0.18
Books, jewellery, china, glass and household goods	1.98	2.20	0.0	0.00	0.00
Health, personal care, beauty or chemist goods	2.43	2.70	23.8	0.58	0.64
Recreational goods including bicycles, toys, sports and camping equipment	1.83	2.03	20.0	0.37	0.41
Other	1.43	1.59	10.0	0.14	0.16
Total	15.09	16.79	-	1.89	2.10

Table 11: Total comparison goods turnover of Waterlooville Town Centre 2019-2023 £ms (2018 prices)

Zone	2019	2023	Inflow in 2023 (10%)³	Total comparison goods turnover 2023
	£ms	£ms	£ms	£ms
Zone A	28.46	31.91	3.19	35.10
Zone B	55.03	61.47	6.15	67.62
Zone C	29.92	34.43	3.44	37.87
Zone D	1.89	2.10	0.21	2.31
Elsewhere ⁴	17.30	19.49	-	19.49
Total	132.60	149.40	12.99	162.39

³ Based on assumptions underpinning 2008 retail study by NLP.

⁴ The 2008 retail study confirmed that Waterlooville Town Centre attracted comparison goods expenditure across all 22 zones. Our survey encompasses 9 of the 22 zones. We have therefore made an allowance of 15% from elsewhere in the borough based on the proportion derived from the other zones (source Table 3C of Appendix C of the 2008 retail study)

Table 12: Comparison goods expenditure retention: WaterlooVille Town Centre 2019-2023 (£ms) (2018 prices)

	Total comparison goods expenditure within Zones A-D 2019	Total comparison goods expenditure within Zone A-D 2023	Total expenditure retained by WaterlooVille Town Centre 2019	Retention rate	Total expenditure retained by WaterlooVille Town Centre 2023	Retention rate
	£ms	£ms	£ms	%	£ms	%
Zones A-D	283.31	316.98	115.30	40.7	129.91	41.0

Table 13a: Zone A Main food shopping patterns 2023 (%; £ms) (2018 prices)

Centre/store	1st	2nd	1st	2nd	Total
			Expenditure available = £17.68m	Expenditure available = £17.69m	Expenditure available = £35.37m
	%	%	£ms	£ms	£ms
Town Centre					
Waterlooville Town Centre					
Asda	21.9	17.1	3.87	3.02	6.89
Sainsbury's	21.9	14.3	3.87	2.53	6.40
Iceland	1.4	2.9	0.25	0.51	0.76
Waitrose	8.2	10.0	1.45	1.77	3.22
Other ⁵	3.5	4.1	0.62	0.73	1.35
Total	56.9	48.4	10.06	8.56	18.62
Out-of-centre stores					
Other: outside Town Centre					
Lidl, Elettra Avenue	0.0	2.9	0.00	0.51	0.51
Tesco Express	0.0	1.4	0.00	0.25	0.25
Elsewhere	43.1	47.3	7.62	8.37	15.99
Total	100	100	17.68	17.69	35.37

⁵ Includes M&S, Home Bargains, local.

Table 13b: Zone B Main food shopping patterns 2023 (%; £ms) (2018 prices)

Centre/store	1st	2nd	1st	2nd	Total
			Expenditure available = £26.59m	Expenditure available = £26.59m	Expenditure available = £53.18m
	%	%	£ms	£ms	£ms
Town Centre					
Waterlooville Town Centre					
Asda	23.8	24.3	6.33	6.46	12.79
Sainsbury's	21.9	22.1	5.82	5.87	11.69
Iceland	1.4	0.7	0.37	0.19	0.56
Waitrose	8.2	13.6	2.18	3.62	5.80
Other	5.5	4.2	1.46	1.11	2.57
Total	60.8	64.9	16.16	17.25	33.41
Other: outside Town Centre					
Lidl, Elettra Avenue	9.1	8.6	2.42	2.29	4.71
Tesco Express	0.0	0.7	0.00	0.19	0.19
Elsewhere	30.1	25.8	8.01	6.86	14.87
Total	100	100	26.59	26.59	53.18

Table 13c: Zone C Main food shopping patterns 2023 (%; £ms) (2018 prices)

Centre/store	1st	2nd	1st	2nd	Total
			Expenditure available = £21.31m	Expenditure available = £21.32m	Expenditure available = £42.63m
	%	%	£ms	£ms	£ms
Town Centre					
Waterlooville Town Centre					
Asda	16.5	12.3	3.52	2.62	6.14
Sainsbury's	10.1	9.4	2.15	2.00	4.15
Iceland	0.0	0.0	0.00	0.00	0.00
Waitrose	5.8	7.2	1.24	1.54	2.78
Other	3.9	3.3	0.83	0.70	1.53
Total	36.3	32.9	7.74	7.01	14.75
Other: Outside Town Centre					
Lidl, Elettra Avenue	6.5	4.3	1.39	0.92	2.31
Tesco Express	0.7	0.0	0.15	0.00	0.15
Elsewhere	56.5	62.8	12.03	13.39	25.42
Total	100	100	21.31	21.32	42.63

Table 13d: Zone D Main food shopping patterns 2023 (%; £ms) (2018 prices)

Centre/store	1st	2nd	1st	2nd	Total
			Expenditure available = £3.42m	Expenditure available = £3.42m	Expenditure available = £6.84m
	%	%	£ms	£ms	£ms
Town Centre					
Waterlooville Town Centre					
Asda	0.0	0.0	0.00	0.00	0.00
Sainsbury's	4.3	17.4	0.15	0.60	0.75
Iceland	0.0	0.0	0.00	0.00	0.00
Waitrose	17.4	8.7	0.60	0.30	0.90
Other	6.1	5.3	0.21	0.18	0.39
Total	27.8	31.4	0.96	1.08	2.04
Other: Outside Town Centre					
Lidl, Elettra Avenue	4.3	4.3	0.15	0.15	0.30
Tesco Express	0.0	0.0	0.00	0.00	0.00
Elsewhere	67.9	64.3	2.31	2.19	4.50
Total	100	100	3.42	3.42	6.84

Table 14a: Zone A Top-up food shopping patterns 2023 (%; £ms)

Centre/store		Total Expenditure available = £11.79m
	%	£ms
Town Centre		
Waterlooville Town Centre		
Asda	9.1	1.07
Sainsbury's	10.6	1.25
Iceland	3.0	0.35
Waitrose	7.6	0.90
Other	6.8	0.80
Total	37.1	4,37
Other: outside Town Centre		
Lidl. Elettra Avenue	1.5	0.18
Tesco Express	18.2	2.15
Elsewhere	43.2	5.09
Total	100	11.79

Table 14b: Zone B Top-up food shopping patterns 2023 (%; £ms)

Centre/store		Total
		Expenditure available = £17.73m
	%	£ms
Town Centre		
Waterlooville Town Centre		
Asda	12.5	2.22
Sainsbury's	7.1	1.26
Iceland	1.9	0.34
Waitrose	9.8	1.74
Other	8.9	1.58
Total	40.2	7.14
Other: Outside Town Centre		
Lidl. Elettra Avenue	6.3	1.12
Tesco Express	10.7	1.90
Elsewhere	42.8	7.57
Total	100	17.73

Table 14c: Zone C Top-up food shopping patterns 2023 (%; £ms)

Centre/store		Total
		Expenditure available = £14.21m
	%	£ms
Town Centre		
Waterlooville Town Centre		
Asda	7.6	1.08
Sainsbury's	4.8	0.68
Iceland	1.0	0.14
Waitrose	1.0	0.14
Other	3.9	0.56
Total	18.3	2.60
Other: outside Town Centre		
Lidl. Elettra Avenue	1.9	0.27
Tesco Express	0.0	0.00
Elsewhere	79.8	11.34
Total	100	14.21

Table 14d: Zone D Top-up food shopping patterns 2023 (%; £ms)

Centre/store		Total
		Expenditure available = £2.28m
	%	£ms
Town Centre		
Waterlooville Town Centre		
Asda	0.0	0.00
Sainsbury's	5.9	0.13
Iceland	0.0	0.00
Waitrose	5.9	0.13
Other	0.0	0.00
Total	11.8	0.26
Other: Outside Town Centre		
Lidl. Elettra Avenue	0.0	0.00
Tesco Express	0.0	0.00
Elsewhere	88.2	2.02
Total	100	2.28

Table 15: Estimated comparison and convenience goods turnover in 2023 (£ms)(incl VAT)

Unit	Proposed occupier	Gross floor area (sq.m.)	Sales area (sq.m)	Sales area (Comparison Goods)(sq.m.)	Comparison goods sales density £'s sq.m.	Comparison goods turnover £ms	Sales area (convenience goods)(sq.m.)	Convenience goods sales density £'s sq.m.	Convenience goods turnover £ms
1	Aldi	1,786	1,429	350	10,187	3.56	1,079	12,228	13.25

Note:

Net sales area assumed at 80% of gross.

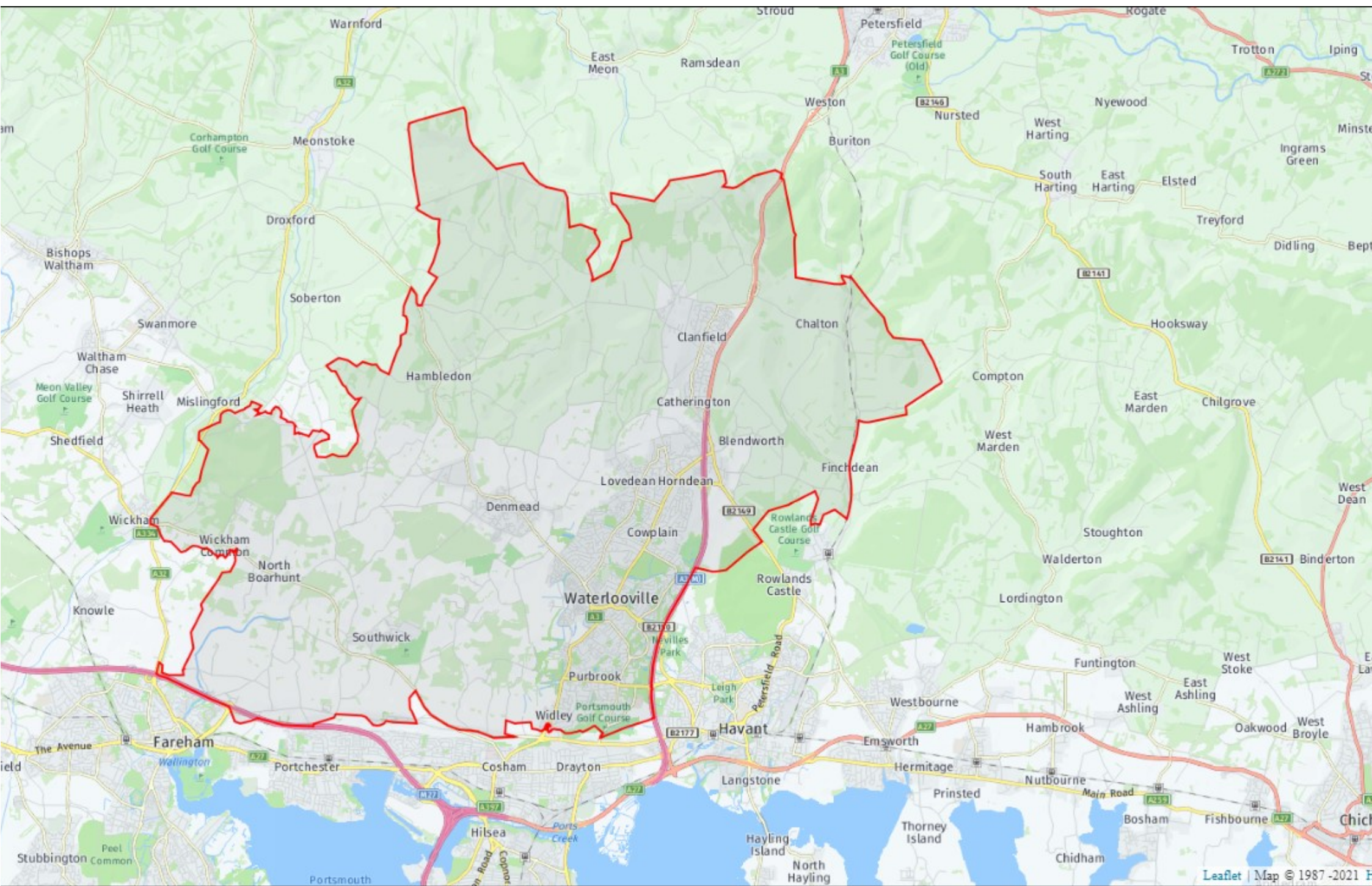
Table 16: Convenience goods trade draw by zone 2023 (%; £ms)

Zone	Convenience	Convenience
	%	£ms
1	30	3.98
2	35	4.64
3	18	2.39
4	2	0.27
Elsewhere	15	1.97
Total	100	13.25

Table 16: Convenience goods trade diversion 2023 £ms (2018 prices)

Centre/store	Main food 4 Zones	Top-up 4 Zones	Total Food and convenience goods expenditure from 4 zones	Inflow 15%	Total	Trade draw	Trade diversion	Impact
	£ms	£ms	£ms	£ms	£ms	%	£ms	%
Town Centre								
Waterlooville Town Centre								
Asda	25.82	4.37	30.19	4.53	34.72	22	2.92	8.4
Sainsbury's	22.99	3.32	26.31	3.94	30.25	15	1.97	6.5
Iceland	1.32	0.83	2.15	0.32	2.47	1	0.13	5.3
Waitrose	12.70	2.91	15.61	2.34	17.95	5	0.66	3.3
Other	10.94	2.94	13.88	2.08	15.96	5	0.66	4.1
Total	73.77	14.37	88.14	13.21	101.35	-	6.34	6.3
Out-of-centre stores: Waterlooville and Elsewhere								
Lidl	7.83	1.57	9.40	1.41	10.81	27	3.58	33.1

Elsewhere	60.78	26.02	86.80	-	86.80	25	3.31	3.8
Total	142.38	41.96	184.03	14.62	198.96	100	13.25	6.7





Appeal Decision

Inquiry Held on 2 December 2020

Site visits made on 17 November and 4 December 2020

by S R G Baird BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 17th December 2020

Appeal Ref: APP/N1025/W/20/3251415

Former Stadium Industrial Park, Nottingham Road, Long Eaton, NG10 2AU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Lidl UK GMBH and Clowes Developments against the decision of Erewash Borough Council.
 - The application Ref ERE/1018/0038, dated 5 October 2018, was refused by notice dated 24 October 2019.
 - The development proposed is the erection of a Lidl food store (1,925 sq. m gross) (Use Class A1) and 2 retail units (Use Class A1) (1,394sqm gross) and associated car parking servicing, infrastructure works and landscaping arrangements with access from Nottingham Road.
-

Preliminary Matters

1. Prior to being determined, the description of the proposal was amended. I shall deal with the appeal based on, the refusal of planning permission for the erection of a Lidl food store (1,944 sq. m gross) (Use Class A1) and one DIY retail unit (Use Class A1) (1,394 sq. m) with associated car parking, servicing, infrastructure works and landscaping with customer access from Nottingham Road and servicing from Springfield Avenue.
2. The application was refused for 3 reasons, (1). a failure to consider sequentially preferable sites, (2). an adverse impact on the vitality and viability of Long Eaton Town Centre and (3). an adverse impact on the street scene. The Statement of Common Ground (SoCG) confirms that the local planning authority (lpa) would not pursue the first reason for refusal (RfR) and in relation to RfR 2, the sole concern relates to the impact of convenience goods trade diversion¹.
3. Notwithstanding the comments and conclusions contained at paragraphs 5.4 and 5.7 of the proof-of-evidence on retail impact², the lpa confirmed that it did not intend to pursue the suggestion that the development would have an adverse impact on existing, committed and planned public and private investment in the town centre³.

Decision

4. The appeal is allowed and planning permission is granted for the erection of a Lidl food store (1,944 sq. m gross) (Use Class A1) and one DIY retail unit (Use Class A1) (1,394 sq. m) with associated car parking, servicing,

¹ Statement of Common Ground paragraphs 7.2 and 7.14.

² Proof of Evidence of Mr Birkinshaw.

³ National Planning Policy Framework paragraph 89 (a).

infrastructure works and landscaping with customer access from Nottingham Road and servicing from Springfield Avenue at the former Stadium Industrial Park, Nottingham Road, Long Eaton, NG10 2AU in accordance with the terms of the application, Ref ERE/1018/0038, dated 5 October 2018, and the plans submitted with it, subject to the conditions contained in the attached Schedule of Conditions.

Main Issues

5. These are: the impact on the vitality and viability of Long Eaton Town Centre with reference to convenience goods trade diversion, and the effect on the street scene.

Reasons

6. The development plan includes the Erewash Core Strategy adopted March 2014 (CS). Relevant policies are, Policy 6: The Role of Town and Local Centres and Policy 10 Design and Enhancing Local Identity.

Vitality & Viability

Quantitative Assessment

7. Consistent with the objectives of the National Planning Policy Framework (Framework), CS Policy 6 indicates that applications for retail uses over 2,500 sq. m will be refused if the impact on a town centre is significantly adverse. Planning Practice Guidance (PPG) indicates that impact assessments should be done in a proportionate and locally appropriate way, drawing on existing information where possible.
8. The lpa acknowledges that the appellants have undertaken an impact assessment using a standard methodology and an evidence base that is appropriate for a quantitative retail impact assessment⁴. The assessment concludes that the proposed food store would have a solus convenience goods impact of some 9.5% and an overall trade diversion of some 2.1% on the town centre. The assessment uses as a base, a Retail Needs Study commissioned by the lpa and published in 2007 and updated in 2010 to which the appellants' have applied professional judgement and company published information to provide an up-to-date base.
9. The lpa does not produce a quantitative assessment of its own. Rather it asserts that the appellants' quantitative assessment, "...appears to be an underestimate..." with the answer falling within, "...the range of 10-20%...". The lpa's conclusion is underpinned by criticism of the appellants' approach to store turnovers, which it suggests over-estimates the turnovers of non-town centre stores and underestimates the relative importance of the town centre and the level of trade diversion.
10. The key example the lpa uses to support its approach is the appellants' adjustment of the turnover of the edge-of-centre Tesco Extra. Here, the appellants' use a turnover assumed to be the mid-point between the turnover shown in the 2010 update of the 2007 Retail Needs Study and a comparator store. Based on data collected in 2006, the 2007 Study concluded that the Tesco store was under-trading; a not unreasonable conclusion given that the

⁴ Statement of Common Ground paragraphs 7.3 and 7.6.

store had only been open for 2 years. The 2010 update repeated this conclusion albeit with a qualification. However, this data is at least 10 years old and the likely level of current turnover needs to reflect informed observation: a process the appellants undertook. Moreover, I am wary of placing significant reliance on 10-year old trading positions when patterns of customer behaviour have changed dramatically in that time.

11. I observed the store operating during my pre and post-inquiry visits. The post-inquiry visit was undertaken on a Friday mid-morning, when weather conditions were foul, and Erewash was part of Tier 3 restricted area. Both conditions were, in my view, significant disincentives for shoppers to venture out. Whilst my observations are qualitative snapshots of likely performance, I was able to confirm that, even in these challenging circumstances, the appellants' conclusion that the Tesco store did not exhibit any of the classic indicators of under-trading was correct. The car park was well used, numbers entering and using the store were noticeably high, most of the tills were open and there appeared to be no shortage of staff. Similar observations, albeit at lower levels of activity, were made at the Aldi, Iceland and Farmfoods store.
12. A second point made by the lpa was the difference in the respective turnovers of the similarly sized edge-of-centre Tesco Extra and the out-of-centre Tesco Extra at Toton. Respectively the 2021 turnovers are estimated at some £37.5m and £25.5m. Apart from the obvious locational differences and the impact this might have on turnover, the turnover of the store at Toton was reduced to reflect the impact of the M&S food store at Chilwell. Given my observations of the level of activity at that store, I can fully understand the appellant's adjustment.
13. Drawing all the above together, the appellants' adjustments appear to me to be reasonable. As such and given the methodology is accepted, the appellants' quantitative assessment of convenience goods trade diversion from the town centre to the proposed food store at some 9.5% and an overall trade diversion of some 2.1% appears reasonable.

Qualitative Assessment

14. PPG⁵ identifies several indicators that may be relevant in assessing the health of a town centre. These include accessibility; diversity of uses; vacancy levels; pedestrian flows and environmental quality. My assessment of qualitative impact is, amongst other things, guided by an October 2020 report produced by the Head of Planning and Regeneration to the Town Deal Board and Health Checks published by the Council in 2006, 2018 and 2019.
15. The October 2020 report's context for assessing the health of the town centre, was that, of a national decline in small-town retailing, the 2008 financial crisis and the rise in on-line retailing. Following the relocation of Asda to and the opening of Tesco on edge-of-centre sites and Aldi opening within the town centre, the report notes that the town centre had "evolved" with space vacated by chain stores being taken on by independent retail services and that over 200 businesses occupied premises in the town centre. It was noted that service uses collectively build on the appeal of the town centre.

⁵ Town Centres & Retail Paragraph: 006 Reference ID: 2b-006-20190722.

16. The October 2020 report notes, that Long Eaton is accessible, being within easy walking distance of most of its population and benefits from several high-frequency bus routes and ample public parking. Health Checks, published in 2006, 2018 and 2019, show that the number of convenience goods units in the convenience category remained stable at 20 and that units in the retail services category rose from 31 in 2006 to 36 in 2018 and 38 in 2019. Overall, the number of Leisure, Financial/Business and other Commercial Services within the town centre has remained generally stable. On balance these proportions suggest a diverse town centre.
17. The 2019 Health Check identified a vacancy rate at some 10% when the national rate was some 11.66%. Whilst a 10% rate would seem high, a level of vacancies is required to allow existing businesses to relocate to larger or better located premises and to provide space for new businesses to open. Moreover, the vacant units are spread throughout the town centre with the majority located outside the primary shopping area. During my visits, it was apparent that there was no noticeable concentration of vacancies or that the overall level of vacancies, suggested a failing or fragile town centre.
18. As to pedestrian flows, details of monthly visitor figures and daily averages for the period April 2019 to April 2020 were provided. As one would expect, the April 2020 count, taken during the first national lockdown, fell dramatically. However, for the remainder of the time, monthly and average daily flows appear consistent. Again, recognising it was a snapshot, on my post-inquiry visit, I was surprised to see material levels of pedestrian flows, particularly in the primary shopping area.
19. Allied to pedestrian flows are linked trips and the lpa's concern that trade diversion to Lidl would reduce the potential for linked trips and as such the attractiveness of the town centre. Whilst I observed people walking from the car park at Tesco/Aldi, there is no objective evidence whether these pedestrians were making a linked trip or were just taking advantage of the free car parking to make a trip to the town centre service uses. In any event, as the October 2020 report notes, service uses are difficult to replicate online and are part of the appeal of the town centre. Indeed, despite on-line banking being available for several years, the town centre has a good representation of banks and building societies. This suggests they are continuing to service significant walk-in demand. In this context, it cannot be assumed that convenience goods shoppers using the out-of-centre Lidl would abandon the town centre. Moreover, given the acknowledged accessibility of the town centre, what is most likely to happen is that visits would be made separately rather than as linked trips.
20. The town centre has seen several environmental improvements in recent years, the most significant being the pedestrianisation of High Street from its junction with Market Place both of which form part of the primary shopping area creating an attractive environment. Overall, within the town centre the quality of buildings and the shopping environment is generally good.
21. No information on commercial rents/yields were produced. Instead, the lpa refer to static business rates and falling market incomes as indicators of the failing health of the town centre. Whilst PPG does not list these as factors that may be relevant when assessing the health of the town centre, I recognise that the list is not exclusive. The rateable value of a business

represents the Valuation Offices assessment as to the likely rental value of a property at the time of the valuation. The evidence produced by the lpa has been selective and should be treated with caution. The appellants have provided information on all the shops in the High Street and Market Place. This fuller picture throw-up several anomalies where apparently similar properties have materially different rateable values. In this context, using rateable values is not, in my view, a reliable proxy for commercial rents/yields.

22. Market income has fallen since 2006. However, other than suggesting that this is an indicator of fragile health, there is no attempt by the lpa to identify why this is happening and whether it is truly an indicator of a centre's health. Indeed, if the authors of the PPG thought that the presence of a market and its health was a significant factor in assessing the health of a town centre, I am in no doubt it would have appeared in the list of potentially relevant factors. Whilst the lpa assert that a Lidl has the potential to undermine the market, which it acknowledges has been in decline for the last 14 years there is no objective or subjective attempt to suggest why. Moreover, having viewed the nature of the current offer of the market, which is almost all non-food, and comparing this to the range offered in the Lidl middle isle there, is, in my view, no comparison or indeed scope for competition.
23. The lpa submit 2 other factors for consideration. These are the effect of HS2 running along the eastern edge of the town centre and the impact of Covid 19. The lpa indicate that construction of HS2 will form a physical and physiological barrier to east-west movement for up to a decade and the severance could significantly affect the town centre. Whilst the works will be substantial, there is no indication that the east-west link formed by Nottingham Road, one of the main routes into the town from the east, would be physically severed for all or even some of that time. Moreover, if as the lpa suggest that some 15% of the catchment area and 30% of the walking and cycling catchment area in the east would be cut off from the town centre, the corollary must be true in that a substantial part of the total catchment area to the west would be cut off from the Lidl store. On this basis, the assertions that the town centre would be significantly weakened has no evidential basis.
24. What the ultimate effect of the Covid 19 pandemic will be on retailing in general and this town centre is unknown. Whilst it may prove the final straw for some commercial activities that were already struggling before March 2020 it may also, once life without restrictions returns, provide opportunity for others to emerge. In this context, to weigh such a significant unknown and hopefully short-term factor in the balance when assessing economic investment of the scale and nature proposed by the appellants is, in my view, either impossible or short sighted.

Conclusion on Vitality and Viability

25. Drawing all the above together, the potential impact of this proposal on convenience goods retailing and town centre trade would not be significantly adverse and would not conflict with the objectives of CS Policy 6.

Street Scene

26. The Framework, the National Design Guide and CS Policy 10 seek to ensure that, having regard to context, new development is designed and laid out to create high quality buildings and places.
27. Nottingham Road is one of the main roads into Long Eaton. To the east, the road is wide and for the most part contains mature dwellings of varying ages styles and types. Whilst most of the dwellings are set close to the road on a consistent building line, the straightness and width of the road creates a strong sense of spaciousness. That said, there is nothing in the nature of the road or the style and position of the buildings that elevates this part of Nottingham Road above anything other than an ordinary and unassuming main route into a town centre.
28. The proposed layout has the retail units set to the rear of the site with the Nottingham Road Frontage occupied by the access, customer car parking and landscaping. The SoCG confirms that, *"...the scale, bulk, massing, visual appearance and design of the proposed buildings and proposed boundary treatment are acceptable."* Thus, the issue is narrowly confined to whether the open frontage would harm the character of the street scene.
29. Change in the street scene happens over time and this stretch of Nottingham Road is no different. A substantial commercial building has been demolished creating an open frontage and the open gap formed by the frontage of the former race car circuit and access to the Half Moon Public House has been replaced with houses fronting the street and a road serving an estate behind. However, these changes, the creation of one gap and the loss of another have not materially altered the overarching character of Nottingham Road. Thus, given the acknowledgement that the design and appearance of the proposed buildings is acceptable, the creation of a landscaped open frontage to Nottingham Road would not materially alter or harm the overriding character and appearance of this stretch of Nottingham Road. Whilst the SoCG indicates that the landscaping of the site boundaries shown on the submitted plans is acceptable, the appellant has provided details of how this could be enhanced. Therefore, on this issue, I conclude that the proposed development would not conflict with the objectives of CS Policy 10, the Framework or the National Design Guide.

Other Matters

30. Vehicular access for customers would be from Nottingham Road with service vehicles using Station Road and Springfield Avenue. The highway authority has no objection to these arrangements, and I have no reason to disagree with those conclusions. Station Road and Springfield Avenue provided access to the former Stadium Industrial Park. Reflecting its previous function, Springfield Avenue is wide and could accommodate the relatively low level of service traffic that would be generated by these stores. In terms of noise, the existing environment of Springfield Avenue is affected by trains using the elevated line on the western side. A 6-day survey at the end of September beginning of October indicates that between 0700 and 2300 hours there were an average of 9 trains per day and between 2300 and 0700 hours there were an average of 4 trains. In this context, the additional service traffic generated by the store would not materially add to the noise environment. Potential

noise from manoeuvring in the service yard could be acceptably mitigated through appropriate screening of the areas.

CONCLUSIONS

31. For the above reasons and having taken all other matters into consideration, I conclude that the proposal would not materially affect the vitality and viability of Long Eaton Town Centre or have an unacceptable effect on the character or appearance of the street scene. As such the proposal would not conflict with the Erewash Core Strategy and the Framework when read as a whole. Accordingly, this appeal is allowed.

Conditions

32. A list of suggested conditions, including pre-commencement conditions were discussed and agreed during the inquiry. For the avoidance of doubt and in the interests of proper planning, conditions specifying the approved plans (2); the scale of the units and the nature of the goods to be sold (18, 19 & 20) are reasonable and necessary. Conditions relating to the submission of details and the implementation of approved schemes for: construction management (3 & 4); surface water drainage (5); ground remediation (6 & 7); the treatment of groundwater abstraction boreholes (8 & 9); finishing materials (10); hard and soft landscaping (12 & 13); vehicular access (11); noise mitigation (15); hours of operation (16); delivery times (17); and travel planning (14) are reasonable and necessary in the interests of the appearance of the area, highway safety, and the protection of neighbours' living conditions. In the interests of precision and enforceability several of the suggested conditions have been reworded.

George Baird

Inspector

APPEARANCES

FOR THE APPELLANTS

Christopher Lockhart-Mummery QC, instructed by Vicky Fowler, Partner, Gowling WLG (UK) LLP.

He called:

Sean McGrath, BA (Hons), MSc and MRTPI.
Director, WSP.

Conditions Round Table Discussion

Julie White.
WSP.

FOR THE LOCAL PLANNING AUTHORITY

Scott Stemp of Counsel, instructed by Brendan Morris, Head of Law and Corporate Governance, Erewash Borough Council.

He called:

Steve Birkinshaw, BSc, MSc, MRTPI.
Head of Planning & Regeneration, Erewash Borough Council.

Richard Snow, BA (Hons), Dip TP, MRTPI.
Development Manager, Erewash Borough Council.

DOCUMENTS SUBMITTED DURING THE INQUIRY

Doc 1 - Email dated 3 December 2020 confirming appellants' acceptance of pre-commencement conditions.

SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following plans:
Proposed Site Plan A-PL-003-E;
Proposed Store Plan A-PL-004-C;
Proposed Retail Unit Elevations A-PL-009-B;
Proposed Surface Treatment Plan A-PL-013-E;
Proposed Boundary Treatment Plan A-PL-014-E;
Proposed Retail Units Building Plan A-PL-005-B;
Proposed Store Roof Plan A-PL-006-C;
Proposed Retail Roof Plan A-PL-007-B;
Proposed Site / Building Sections A-PL-010-B;
Proposed Drainage Strategy 000950-JPL-ZZ-XX-DR-D- 4101 Rev PO4);
Landscape masterplan 801-LEN-01-C;
External Works Sheet 1 PL-0011 Rev B;
External Works Sheet 1 PL-0012 Rev A;
Site Access Nottingham Road VN81037-SK-001;
Swept Path Analysis SK-001-TRK;
Proposed Store Elevations A-PL-008-Rev B; and
Proposed Lighting Layout DWG01.
- 3) The development hereby permitted shall not commence until a Construction Management Plan (CMP) has been submitted to and, and approved in writing by, the local planning authority. The CMP shall include details of the following;
 - plant and materials storage within the site curtilage;
 - loading and unloading of materials within the site curtilage;
 - management of surface water run-off from the site during the construction phase; and
 - measures to minimise dust and noise nuisance during construction activities.
- 4) Construction works and deliveries to the site shall not take place outside of the following hours: 0730 and 1800 Monday to Friday; 0800 and 1300 Saturday; and no work on Sundays, Bank and Public Holidays.
- 5) No development shall commence until, a detailed design and associated management and maintenance plan of the surface water drainage for the site, has be submitted to and approved in writing by the local planning authority. The scheme shall be in accordance with the principles outlined within:
 - a. Proposed Drainage Strategy, March 2019, Referenced JPL-ZZ-XXDR-D-41017- Rev P04 by Jackson Purdue Lever, "including any subsequent amendments or updates to those documents as approved by the Flood Risk Management Team":
 - b. Drainage Strategy Additional Technical Note, 13th August 2019, Referenced CWC00950: and

- c. DEFRA's Non-statutory technical standards for sustainable drainage systems (March 2015).

The approved drainage system shall be implemented in accordance with the approved detailed design, prior to the use of the buildings commencing.

- 6) No development shall commence until an assessment of the risks posed by any contamination, carried out in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency's Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), has been submitted to and approved in writing by the local planning authority. If any contamination is found, a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for the approved development shall be submitted to and approved in writing by the local planning authority. The site shall be remediated in accordance with the approved measures and timescale and a verification report shall be submitted to and approved in writing by the local planning authority.
- 7) If, during development, any contamination is found which has not been previously identified, work shall be suspended and additional measures for its remediation shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures and a verification report for all the remediation works shall be submitted to the local planning authority within 14 days of the report being completed and approved in writing by the local planning authority.
- 8) No development shall commence until a scheme to manage the risks associated with any former groundwater abstraction boreholes/water wells on site has been submitted to, and approved in writing by, the local planning authority. The scheme shall:
 - a. locate, and ascertain the condition of, any such structure(s) on site;
 - b. propose mitigation measures to ensure that any such structure(s) shall not provide a residual pathway for fluid contamination to migrate down into the ground;
 - c. propose mitigation measures to ensure that geological gasses and artesian discharge of water will be prevented from migrating up through the structure(s) into development above; particularly in any location(s) where new development is proposed immediately overhead a former borehole/well.
- 9) No development shall commence until the work required by the approved scheme relating to groundwater abstraction boreholes/water wells, has been implemented and a borehole decommissioning report to be provided by an independent third party documenting the works, actions taken and providing photographic evidence, has been submitted to and approved in writing by the local planning authority.
- 10) Notwithstanding the details shown on the plans hereby approved, no development above slab level shall take place until details (and samples in the case of masonry and render) of the materials, colour, and finish to be used in the construction of the external surfaces of the building hereby

permitted have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and retained as such thereafter.

- 11) Notwithstanding the details shown on drawing VN81037-SK-001, no development above slab level shall take place until details of the proposed access onto Nottingham Road, Long Eaton have been submitted to and approved in writing by the local planning authority. The details shall include 2.4m by 37m visibility splays in either direction, with 6 metre kerbed radii on either side. The approved details shall be implemented prior to the first occupation of any part of the development and the area in advance of the sightlines maintained throughout the life of the development clear of any object greater than 1m in height (0.6m in the case of vegetation) relative to adjoining nearside carriageway channel level.
- 12) Notwithstanding the submitted landscape masterplan (drawing ref: 801-LEN-01-C), the development shall not be brought into use until an enhanced scheme of hard and soft landscaping and works has been submitted to and approved in writing by the local planning authority.
- 13) The approved scheme of hard and soft landscaping shall be carried out no later than the first planting season following the occupation of the building or the completion of the development whichever is the sooner. All planted materials shall be maintained for 5 years and any trees or plants removed, dying, being damaged or becoming diseased within that period shall be replaced in the next planting season with others of similar size and species to those originally required to be planted unless the local planning authority gives written consent to any variation.
- 14) Prior to the occupation of each unit, a Travel Plan comprising immediate, continuing and long-term measures to promote and encourage alternatives to single-occupancy car by staff of the development hereby approved shall be submitted to and approved in writing by the local planning authority. The approved Travel Plans shall then be implemented, monitored and reviewed in accordance with the agreed Travel Plan targets.
- 15) Prior to the occupation of the food store and in accordance with the findings of the Miller Goodall noise assessment (Ref 101867-2, April 2019), a 3m high barrier shall be erected around the external plant yard and alongside the loading bay ramp. A 2.5m high solid gate shall be erected at the access to the service yard, which shall be kept closed except for access to the service yard.
- 16) The development hereby permitted shall only open for use by customers between 0700 and 2300-hours Monday to Saturday and 0900 and 1800 hours on Sunday.
- 17) Deliveries to the retail units hereby approved shall only take place between 0700 and 2300-hours Monday to Saturday and 0900 and 1800 hours on Sunday.
- 18) The total Class A1 (retail) floorspace in the food store hereby permitted shall not exceed 1,944 sq. m (GIA) and the net sales area (defined as all areas to which customers have access, including checkouts and lobbies) shall not exceed 1,265 sq. m.

- 19) Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended), or any Order revoking or re-enacting that Order, the Class A1 (retail) floorspace of the food store hereby approved shall be used primarily for the sale of convenience goods, with a maximum 253 sq. m for the sale of comparison goods.
- 20) Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended), or any Order revoking or re-enacting that Order, the Class A1 (retail) floorspace of the DIY retail unit hereby approved shall be used for the sale of DIY and bulky goods only.